REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-17 are currently pending, Claims 1, 16, and 17 having been amended. The changes and additions to the claims do not add new matter and are supported by the originally filed specification, for example, on page 8, lines 3-22; and Fig. 2.

In the outstanding Office Action, Claims 1-17 were rejected under 35 U.S.C. §102(e) as being anticipated by Ellison et al. (U.S. Patent No. 7,305,711, hereafter "Ellison").

With respect to the rejection of Claim 1 under 35 U.S.C. §102(e), Applicants respectfully submit that the amendment to Claim 1 overcomes this ground of rejection. Amended Claim 1 recites, *inter alia*,

> a segment key file selecting unit that selects one segment key file from plural segment key files at playback of content from a sequence key section in a recording medium, the recording medium storing a video object which has n sequence key sections and the segment key files, each sequence key section being groups of contents formed from m pieces of encrypted contents with different minute portions, each segment key file registering n key entries corresponding to each sequence key section, each key entry associating segment identification information that uniquely identifies a content to be played back among the m contents in the sequence key section with a segment key that is used for decrypting a content corresponding to the segment identification information, n and m being natural numbers;
>
> a content selecting unit that selects each content corresponding to the segment identification information of the n key entries registered in the selected segment key file;
>
> a content decrypting unit that decrypts each selected content by a segment key corresponding to the segment identification information of each selected content; and

Applicants respectfully submit that Ellison fails to disclose or suggest at least these features of amended Claim 1.

Ellison is directed to a method of content protection and distribution of keys to authorized receivers. In one embodiment, Ellison describes that a symmetric content key is protected by encrypting the symmetric content key using a public key of an asymmetric key pair and an appropriate public key encryption algorithm prior to distribution of the symmetric content key to the playback device (see col. 2, lines 55-59). Ellison describes that a corresponding private key is stored on the playback device by a device manufacturer and can be used to decrypt the encrypted symmetric content key during playback of the content (see col. 2, lines 59-63).

Ellison also describes that multiple asymmetric key pairs may be used for better security (see col. 3, lines 4-5). In this regard, the Office Action takes the position that Ellison describes the claimed "segment key file selecting unit" where it describes a set of private keys being stored in a secure manner on a playback device and that one of the private keys is used to decrypt an encrypted symmetric content key for a copy of a content title (see Office Action, at page 3, citing col. 3, lines 4-15).

However, amended Claim 1 defines a content playback apparatus which selects one content among the plurality of encrypted contents with different minute portions, and decrypts the selecting content by the key corresponding to the selecting content.

More specifically, the apparatus of amended Claim 1 plays back a content stored in a recording medium that stores (1) a video object which has n sequence key actions that includes groups of contents formed from m pieces of encrypted contents with different minute portions (in a non-limiting example, n=32 and m= 8, see specification, at lines 3, 12 and 22), and (2) the segment key files (in a non-limiting example, the number of the segment key files is 1024, see specification, at page 8, line 19). Also, Claim 1 defines that each segment key file registers a key entry that associates segment identification information identifying a content to be played back among the plurality of encrypted contents with a

segment key. Furthermore, the segment key file selecting unit of amended Claim 1 selects one segment key file from the plurality of segment key files recorded on the recording medium.

On the contrary, Ellison describes using private keys stored on a playback device to decrypt an encrypted symmetric key, which is stored on a media block of a DVD, which is then used to decrypt the DVD content during playback. Applicants submit that this is different than having a playback device which plays back a content stored in a recording medium that stores (1) a plurality of contents with different minute portions, and (2) segment key files that register key entries associating the identification information that identifies a content to be played back among the plurality of encrypted contents with a segment key. Furthermore, Ellison does not disclose a unit equivalent to the segment key file selecting unit of amended Claim 1, which selects one file out of the plurality of files recorded on the recording medium.

Therefore, Applicants submit that Ellison fails to disclose or suggest "a segment key file selecting unit that selects one segment key file from plural segment key files at playback of content from a sequence key section in a recording medium, *the recording medium storing a video object which has n sequence key sections and the segment key files, each sequence key section being groups of contents formed from m pieces of encrypted contents with different minute portions, each segment key file registering n key entries corresponding to each sequence key section, each key entry associating segment identification information that uniquely identifies a content to be played back among the m contents in the sequence key section with a segment key that is used for decrypting a content corresponding to the segment identification information, n and m being natural numbers,*" as defined by amended Claim 1.

The Office Action also takes the position that Ellison describes "a content selecting unit" as defined by Claim 1 (see Office Action, at page 3, citing col. 2, lines 39-54 of Ellison). However, Ellison does not disclose that a plurality of segment key files are stored in the recording medium. Therefore, Applicants respectfully submit that Ellison fails to disclose or suggest "a content selecting unit that selects each content *corresponding to the segment identification information of the n key entries registered in the selected segment key file*," as defined in Claim 1.

The Office Action also takes the position that Ellison describes "a content decrypting unit" as defined by Claim 1 (see Office Action, at pages 3-4, citing col. 3, lines 4-15 of Ellison). However, Ellison does not disclose that a segment key that is used for decrypting a content is associated with segment identification information that uniquely identifies a content to be played back. Therefore, Applicants respectfully submit that Ellison fails to disclose or suggest "a content decrypting unit that decrypts each selected content *by a segment key corresponding to the segment identification information of each selected content*," as defined in Claim 1.

M.P.E.P. §2131 requires for anticipation that each and every feature of the claimed invention must be shown and requires for anticipation that the identical invention must be shown in as complete detail as contained in the claim.

Applicants respectfully submit that Ellison does not show each and every feature of amended Claim 1 in as complete detail as contained in the claim for at least the reasons discussed above. Thus, Applicants respectfully submit that amended Claim 1 (and all associated dependent claims) patentably distinguishes over Ellison.

Amended independent Claims 16 and 17 recite features similar to those of amended Claim 1 discussed above. Thus, Applicants respectfully submit that amended Claims 16 and 17 patentably distinguish over Ellison.

Consequently, in light of the above discussion and in view of the present amendment, the outstanding grounds for rejection are believed to have been overcome. The present application is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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